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August 25, 2023

VIA E.C.F.

Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Wright v. City of New York et al.
22-cv-03137 (JHR)

Your Honor:

I am an Assistant Corporation Counsel representing defendants in the referenced matter. I write respectfully on behalf of both parties to request an extension of the fact discovery deadline from August 25, 2023 to October 9, 2023.

The extension is needed so as to allow the parties time to complete depositions, which have been delayed, in part, because of an illness suffered by a family member of plaintiff. The parties have rescheduled depositions and anticipate completing all fact discovery by the proposed new date. The parties further advise that neither side will be conducting expert discovery. Since the end date for expert discovery is October 9, 2023, the requested extension will not affect any other dates in the Civil Case Management Plan.

Accordingly, it is respectfully requested that the Court grant the parties joint application to extend the deadline for all fact discovery from August 25, 2023 to October 9, 2023

I thank the Court for its consideration of the foregoing

Respectfully submitted,

s/ *Steve Stavridis*

Steve Stavridis
Senior Counsel

Encl.

cc: All Counsel of record (via ECF)